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September 12, 2019

VIA ECF AND CERTIFIED MAIL

Hon. Jed S. Rakoff, U.S.D.J.  
United States District Court  
Southern District of New York  
500 Pearl Street, Courtroom 14B  
New York, NY 10007

Re: *In re Petrobras Sec. Litig.*,  
No. 14-cv-9662 (JSR)

Dear Judge Rakoff:

I represent Cornell University (“Cornell”) and write pursuant to the Court’s July 29, 2019 Opinion and Order granting in substantial part Cornell’s motion to unseal documents [ECF No. 948] (“Order”).

As ordered by the Court, on August 22, 2019, Petróleo Brasileiro S.A. (“Petrobras”) produced to Cornell a number of documents that were originally filed under seal in the above-captioned action.<sup>1</sup> Petrobras produced entirely unredacted versions of a majority of those documents. It did, however, produce nine documents that are partially redacted and it identified four documents that it contends should be kept entirely under seal. Thereafter, on September 5, 2019, Petrobras provided Cornell’s counsel with access to “Attorney’s Eyes Only” versions of the partially and fully redacted documents it contends should remain under seal.

Following counsel’s review of the documents Petrobras believes should remain under seal (identified in Appendix A to this letter), Cornell does not object to their continued sealing.

Cornell also does not object to the continued sealing of: (a) the deposition transcripts of the employees of Class Representatives (Universities Superannuation Scheme, North Carolina Department of State Treasurer, and Employees’ Retirement System of the State of Hawaii); (b) any document produced by Class Representatives in this litigation; or (c) documents designated as confidential by the underwriter Defendants in this case (BB Securities Ltd., Citigroup Global Markets Inc., J.P. Morgan Securities LLC, Itaú BBA USA Securities, Inc., Morgan Stanley & Co. LLC, HSBC

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<sup>1</sup> By email dated August 12, 2019, the Court granted a one-week extension of the deadlines in the Court’s Order. On September 5, 2019, the Court orally granted Cornell’s request via call to chambers for an additional one-week extension to file this response.

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Securities (USA) Inc., Mitsubishi UFJ Securities (USA), Inc. (n/k/a MUFG Securities Americas Inc.), Merrill Lynch, Pierce, Fenner & Smith Inc., Standard Chartered Bank, Bank of China (Hong Kong) Limited, Banco Bradesco BBI S.A., Banca IMI S.p.A. and Scotia Capital (USA) Inc.), *i.e.* ECF Nos. 619, 628, 633-38, 640-53, 655-56, 658, 660, 665, and 678.

Cornell does, however, respectfully request that any final unsealing order by the Court require the parties to file unredacted and partially unredacted copies of any unsealed documents on the public docket in this case.

Respectfully submitted,

*/s/ Samuel H. Rudman*

Samuel H. Rudman

SHR:paf  
Attachment